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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANTHONY HOROVITZ,

Defendant.

CASE NO.: 2:12-cr-00472-JAD-CWH

**STIPULATION AND ORDER TO EXTEND DEADLINE DATE TO RESPOND TO  
GOVERNMENT'S MOTION FOR INSTALLMENT PAYMENT ORDER [48] SIXTH  
REQUEST**

**IT IS HEREBY STIPULATED** by and between Anthony Horovitz, Defendant, by and through his counsel, Paola M. Armeni, Esq., and Gia N. Marina, Esq., of the law firm of Clark Hill, PLLC, and the Plaintiff, United States of America, by and through Jason Frierson, United States Attorney, and Summer A. Johnson, Assistant United States Attorney, to extend the time for the Defendant to respond to Government's Motion for Installment Payment Order [DKT 48], filed on July 7, 2022.

**IT IS HEREBY FURTHER STIPULATED AND AGREED** that the deadline for filing any response be extended up to and including October 28, 2022.

This Stipulation is entered into for the following reasons:

1. The Response deadline date is September 27, 2022 [DKT 58].

- 1        2. The law firm of Clark Hill PLLC was retained on July 14, 2022.
- 2        3. Defense Counsel is in constant communication with the Government working toward an
- 3 effective resolution for all parties.
- 4        4. Defense Counsel prepared a comprehensive proposal to resolve this matter to the
- 5 satisfaction of all parties. The proposal was sent to Government's counsel on or about September
- 6 22, 2022.
- 7        5. On or about September 26, 2022, Government's counsel indicated she was in the process
- 8 of preparing a response to the defense's proposal and we may need more time to work out the
- 9 particulars of negotiations.
- 10       6. This Stipulation is necessary in order to allow Government's counsel the necessary time
- 11 to review the proposal and make a decision as to whether the proposal is sufficient to resolve
- 12 this matter without the necessity to reinstate briefing.
- 13       7. For these reasons, the parties agree that the Response to the Motion for Installment
- 14 Payment Order will be filed on October 28, 2022.
- 15       8. The additional time requested herein is not sought for purposes of delay and the denial
- 16 of this request for a continuance could result in a miscarriage of justice.
- 17       9. For all of the above-stated reasons, the ends of justice would be best served by the
- 18 continuance of the Response to Motion for Installment Payment Order.
- 19       10. This is a Sixth Request for a continuance of the response to the Motion for Installment
- 20 Payment Order.

21 JASON FRIERSON  
22 UNITED STATES ATTORNEY  
23 DISTRICT OF NEVADA

CLARK HILL PLLC

24 DATED this 26<sup>th</sup> day of September, 2022.

DATED this 26<sup>th</sup> day of August, 2022.

25 /s/ Summer A. Johnson  
26 SUMMER A. JOHNSON  
27 Assistant United States Attorney  
28 Attorneys for Plaintiff,  
UNITED STATES OF AMERICA

/s/ Gia N. Marina  
PAOLA M. ARMENI  
GIA N. MARINA  
Attorney for Defendant,  
ANTHONY HOROVITZ

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANTHONY HOROVITZ,

Defendant.

CASE NO.: 2:12-cr-00472-JAD-CWH

**FINDINGS OF FACT, CONCLUSION OF LAW AND ORDER**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby finds that:

**CONCLUSIONS OF LAW**

Based on the fact that counsel has agreed to a continuance, the Court hereby concludes that:

1. The Response deadline date is September 27, 2022 [DKT 58].
2. The law firm of Clark Hill PLLC was retained on July 14, 2022.
3. Defense Counsel is in constant communication with the Government working toward an effective resolution for all parties.
4. Defense Counsel prepared a comprehensive proposal to resolve this matter to the satisfaction of all parties. The proposal was sent to Government's counsel on or about September 22, 2022.
5. On or about September 26, 2022, Government's counsel indicated she was in the process of preparing a response to the defense's proposal and we may need more time to work out the particulars of negotiations.
6. This Stipulation is necessary in order to allow Government's counsel the necessary time to review the proposal and make a decision as to whether the proposal is sufficient to resolve this matter without the necessity to reinstate briefing.

1 7. For these reasons, the parties agree that the Response to the Motion for Installment  
2 Payment Order will be filed on October 28, 2022.

3 8. The additional time requested herein is not sought for purposes of delay and the denial of  
4 this request for a continuance could result in a miscarriage of justice.

5 9. For all of the above-stated reasons, the ends of justice would be best served by the  
6 continuance of the Response to Motion for Installment Payment Order.

7 10. This is a Sixth Request for a continuance of the response to the Motion for Installment  
8 Payment Order.

9 11. The ends of justice are served by granting said continuances and outweigh the best interest  
10 of the public and since the failure to grant said continuances would be likely to result in a  
11 miscarriage of justice, as it would deny the parties herein sufficient time, and the opportunity,  
12 within which to effectively and thoroughly prepare and file responses, and replies, and taking into  
13 account the exercise of due diligence.

14 **ORDER**

15 **IT IS FURTHER ORDERED** that the deadlines for filing of responsive pleading, is hereby  
16 due on or before October 28, 2022.

17 **IT IS FURTHER ORDERED** that the deadlines for filing a reply is hereby due on or before  
18 November 4, 2022.

19 **DATED** this 28th day of September 2022.

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21 **UNITED STATES DISTRICT COURT JUDGE**  
22 **CASE NO.: 2:12-cr-00472-JAD-CWH**  
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